



NRO-041-15

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

NORTHERN REGIONAL OFFICE

Molly Joseph Ward
Secretary of Natural Resources

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David K. Paylor
Director

Thomas A. Faha
Regional Director

COMMONWEALTH OF VIRGINIA Department of Environmental Quality Northern Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Buckeye Terminals, LLC
Fairfax City, Fairfax County, Virginia
Permit No. NRO70220

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Buckeye Terminals, LLC has applied for a Title V Operating Permit for its Fairfax City, Fairfax County, Virginia facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact: _____ Date: _____
Gary Beeson
(703) 583-3969

Air Permit Manager: _____ Date: _____
James B. LaFratta

Regional Director: _____ Date: _____
Thomas A. Faha

FACILITY INFORMATION

Permittee

Buckeye Terminals, LLC
9601 Colonial Avenue
Fairfax, Virginia 22031

Facility

Buckeye Terminals, LLC Fairfax Terminal
9601 Colonial Avenue
Fairfax, Virginia 22031

County-Plant Identification Number: 51-600-00061

SOURCE DESCRIPTION

NAICS Code: 493190 – Other Warehousing and Storage - Bulk Petroleum Storage

The facility is a bulk liquids petroleum storage and distribution facility with the potential to operate 8,760 hours per year. The terminal structures and equipment include six (6) vertical fixed roof tanks equipped with internal floating roofs with liquid mounted primary and rim mounted secondary seals which may store gasoline, distillates and ethanol products. There are nine (9) fuel additive tanks of 10,000 gallons or less. The facility has one loading rack that may load gasoline, refined gasoline, distillates, and ethanol. The loading rack is comprised of six (6) bays with eighteen (18) arms. The exhaust from the loading rack is connected to a carbon absorption vapor recovery unit (VRU) as the primary control unit with a vapor combustion unit (VCU) as a backup. The vapor control units are electrically interlocked to operate when tanker trucks loading pumps are activated. If the VRU system pressure is insufficient due to electrical failure or other causes, the VCU is automatically actuated. If the VCU operating conditions are not established, the truck loading pumps are automatically shut down.

There are buildings which house offices, maintenance facilities, and a garage building. Gasoline and distillates are received at the site by pipeline while ethanol is received at the facility via trucks. The loading rack is configured to allow loading of six (6) tanker trucks simultaneously, with either gasoline, distillates, or ethanol.

The facility is a Title V major source of volatile organic compounds (VOC) and is currently operating under the latest NSR permit amendment issued on April 23, 2003. Because the Title V renewal application was received in a timely manner the facility also operates with the protection of the Title V permit shield for the Title V permit issued on January 11, 2001. The source is located in an ozone non-attainment area and in the Ozone Transport Region. The facility is a Prevention of Significant Deterioration (PSD) minor for all other PSD regulated pollutants. Tanks EU-1, EU-2, EU-3, EU-4, EU-5, and EU-6 and the truck loading rack EU-LR are subject to the requirements of 40 CFR 63, Subpart BBBB (Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities) when in gasoline service. The loading rack is also subject to 40 CFR 60, Subpart XX (Standards of Performance for Bulk Gasoline terminals) when in gasoline service. As an area source of Hazardous Air Pollutants (HAP) the source is exempt from the requirements of 40 CFR 63, Subpart R (National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations) under §63.420(a)(2) but

must maintain records to demonstrate is continued exempt status. Tank EU-6 is subject to 40 CFR 60, Subpart K since constructed commenced in 1978 prior to the May 19 cutoff date.

Tanks EU-1, EU-2, EU-3, EU-4, EU-5, and EU-6 and the truck loading rack EU-LR are subject to the requirements of Virginia Rule 4-37 (9 VAC 5-40-5200 et al: Emission Standards For Petroleum Liquid Storage and Transfer Operations) when in gasoline service.

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, was most recently conducted on March 28, 2013. During that inspection it was noted that there was missing data entries for the VRU as part of a condition of the CAM portion of the Title V permit. Meetings with the facility resulted in a consent order which was issued on September 11, 2013 adhered to by the facility and was cleared on September 16, 2013. Since that time all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
EU-1	N/A	Fixed Roof Petroleum liquid storage tank. Constructed 1964	3,696,410 gallons	Internal floating roof w/primary and secondary seals.	_____	VOC, HAP	April 23, 2003
EU -2	N/A	Fixed Roof Petroleum liquid storage tank. Constructed 1964	3,054,885 gallons	Internal floating roof w/primary and secondary seals.	_____	VOC, HAP	April 23, 2003
EU -3	N/A	Fixed Roof Petroleum liquid storage tank. Constructed 1964, IFR installed 2005	1,015,162 gallons	Internal floating roof w/primary and secondary seals.	_____	VOC, HAP	April 23, 2003*
EU -4	N/A	Fixed Roof Petroleum liquid storage tank. Constructed 1964	5,063,401 gallons	Internal floating roof w/primary and secondary seals.	_____	VOC, HAP	April 23, 2003
EU -5	N/A	Fixed Roof Petroleum liquid storage tank. Constructed 1970	1,804,732 gallons	Internal floating roof w/primary and secondary seals.	_____	VOC, HAP	April 23, 2003
EU -6	N/A	Fixed Roof Petroleum liquid storage tank. Constructed 1978	3,412,071 gallons	Internal floating roof w/primary and secondary seals.	_____	VOC, HAP	April 23, 2003
EU-LR	VRU/VCU	Truck loading rack	648,000 gallons/hr	VRU/VCU		VOC, HAP	April 23, 2003

*EU-3 had an internal floating roof installed and was determined to be exempt from permitting in an exemption letter dated January 31, 2006. See attached letter.

EMISSIONS INVENTORY

The facility emission data below is actual emission data based on the 2013 annual emission update; the most current data validated by DEQ, and is summarized below in the Criteria and Hazardous Air Pollutant tables.

2013 Actual Emissions

	2013 Criteria Pollutant Emission in Tons/Year				
Emission Unit	VOC	CO	SO ₂	PM-2.5	NO _x
EU-1	1.990	—	—	—	—
EU-2	1.420	—	—	—	—
EU-3	1.047	—	—	—	—
EU-4	1.698	—	—	—	—
EU-5	0.151	—	—	—	—
EU-6	0.035	—	—	—	—
EU-LR	3.170	0.00	0.00	0.00	0.00
Total	9.511	0.00	0.00	0.00	0.00

2013 Facility Hazardous Air Pollutant Emissions	
Pollutant	2013 Hazardous Air Pollutant Emission in Tons/Yr
2,2,4 Trimethylpentane (Iso-Octane)	0.088
Benzene	0.056
Ethyl benzene	0.006
Hexane	0.404
Toluene	0.051
Xylene	0.014

EMISSION UNIT APPLICABLE REQUIREMENTS – STORAGE TANKS (EU-1, EU-2, EU-3, EU-4, EU-5, AND EU-6)

Limitations

The following Virginia Administrative Codes have specific emission requirements that have been determined to be applicable:

9 VAC 5-40-5200 et seq. Existing Stationary Sources - Emission Standards for Petroleum Liquid Storage and Transfer Operations (Rule 4-37)

The following Codes of Federal Regulations have been determined to be applicable:

40 CFR 60, Subpart XX Standards of Performance for Bulk Gasoline Terminals

40 CFR 60, Subpart K Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced After July 11, 1973, and Prior to May 19, 1978

40 CFR 63, Subpart
BBBBBB National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities

Emission Units – Tanks – (ID# EU-1, EU-2, EU-3, EU-4, EU-5, and EU-6)

Emissions to the atmosphere from the fixed roof gasoline tanks are controlled by internal floating roofs resting on the surface of the liquid contents and equipped with closure seals to close the space between the floating roof edge and the tank shell. Tanks storing volatile organic compounds (VOC) shall achieve a minimum of ninety percent (90%) reduction by weight in emissions. The storage of petroleum products with a true vapor pressure greater than or equal to one and one-half pounds per square inch absolute (1.5 psia) shall achieve this reduction by installing an internal floating roof (cover) equipped with closure seals as stated at 9 VAC 5-40-5230(A)(1)(a).

All gasoline storage tanks, EU-1, EU-2, EU-3, EU-4, EU-5, and EU-6, located at this facility conform to the above requirements. These requirements are specified in 9 VAC 5-40-5230.

Limitation on VOC emissions from the six (6) gasoline storage tanks is listed as 20.0 tons /yr. This is stated in Condition 6 of the NSR permit dated April 23, 2003, and the emissions were calculated on the basis on 940,000,000 gallon of annual throughput for the tanks.

Fixed roof tanks storing petroleum liquids with a vapor pressure less than 1.5 psia under actual storage conditions or, in the case of filling or processing, under actual filling conditions, are exempt from Rule 4-37 (9 VAC 5-40-5200(C)).

Limitations placed on this facility regarding distillates are for emission inventory purposes only.

- Title V Condition 1 requires the tanks to be equipped with an internal floating roof resting on the liquid and equipped with seals (Condition 3 of the April 23, 2003 NSR permit).
- Title V Condition 2 limits the annual throughput of gasoline and distillate oil for all tanks to not exceed 940,000,000 gallons per year and requires this annual total to be calculated monthly for the previous 12-month period as required in Condition 4 of the April 23, 2003 NSR permit.
- Title V Condition 3 limits VOC emissions from the storage tanks to not exceed 20.0 tons/year and requires the annual emissions to be calculated monthly for the previous 12-month period as required in Condition 6 of the April 23, 2003 NSR permit.

Monitoring

- Title V Condition 4 requires that the internal floating roof be inspected on each occasion that the tank is emptied and degassed. Any deficiencies shall be repaired prior to refilling the tank. Notification requirements are also included from Condition 10 of the April 23, 2003 NSR permit.
- Title V Condition 5 requires that the facility conduct a visual inspection of the floating roof cover on an annual basis. Specifics of the annual inspection are incorporated in the condition and are derived from Condition 11 of the April 23, 2003 NSR permit.

Recordkeeping

- Title V Condition 6 requires that a copy of the annual visual inspection and a record of the internal inspection during the empty tank inspection to be maintained on site. These records are required in Condition 12 of the April 23, 2003 NSR permit.

- Title V Condition 7 requires that the facility keep the storage and throughput quantities, types of petroleum liquid stored, the average monthly temperature, and true vapor pressure of the liquid stored on the site, as required in Condition 11 of the April 23, 2003 NSR permit.
- Title V Condition 8 requires that the facility keep a record of the annual tank emission calculations allowing the facility to use the EPA TANKS program to calculate emissions.
- Title V Condition 9 requires the facility to maintain a recordkeeping system which details the tank inspections including notification requirements. The basis of this condition comes from Condition 12 of the April 23, 2003 NSR permit.
- Title V Condition 10 includes the requirement to maintain records of all emission data and operating parameters necessary to demonstrate compliance. This requirement is from Condition 15 of the April 23, 2003 NSR permit.

Reporting

- Title V Condition 11 incorporates the reporting requirements of Condition 12 of the April 23, 2003 NSR permit related to the tank inspections and details the various notifications and reports to be submitted.
- Title V Condition 12 stipulates that the facility shall report all deficiencies resulting from the annual inspections required in Condition 5 and sets out timelines for the repair of the tanks, as stipulated in Conditions 11 and 12 of the April 23, 2003 NSR permit.

PROCESS EQUIPMENT REQUIREMENTS – LOADING RACK (EU-LR)

The following Virginia Administrative Codes have specific emission requirements that have been determined to be applicable:

9 VAC 5-40-5200 et seq. Existing Stationary Sources - Emission Standards for Petroleum Liquid Storage and Transfer Operations (Rule 4-37)

The following Codes of Federal Regulations have been determined to be applicable:

40 CFR 60, Subpart XX Standards of Performance for Bulk Gasoline Terminals

40 CFR 63, Subpart BBBBBB National Emission Standards for Hazardous Air Pollutants for
Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities

Limitations

- Title V Condition 13 sets a limit on the annual throughput limits of gasoline through the loading rack, calculated monthly for the previous 12-month period. This requirement is designated in Condition 5 of the April 23, 2003 NSR permit.
- Title V Condition 14 limits the short term emission limits from the VRU and VCU to not exceed 10 milligrams VOC/liter of gasoline loaded as defined in Condition 7 of the April 23, 2003 NSR permit.
- Title V Condition 15 discusses the fugitive emissions and the procedures to determine these emissions.
- Title V Condition 16 limits opacity emitted from the VCU to no greater than 20%, except during one 6-minute period in any one-hour period; the opacity shall not exceed 30% and exempting exceedances due to the presence of water vapor as required by 9 VAC 5-40-80.
- Title V Condition 17 requires that the vapor recovery systems collect the total organic compounds from the tanker trucks during gasoline loading.
- Title V Condition 18 states that it is the responsibility of the owner or operator to insure the proper connections of the vapor collection systems to the tanker trucks during filling operations.
- Title V Conditions 19, 20, and 21 discuss the requirements of the loading rack design and operation.
- Title V Condition 22 limits the total emissions from the VRU and VCU combined to no more than 29.21 tons of VOC annually. Emissions are required to be calculated monthly as the sum of each consecutive 12-month period. This requirement is stated in Condition 8 of the April 23, 2003 NSR permit.

Monitoring

- Title V Condition 23 describes the actions required be the facility in order to demonstrate compliance with the opacity limits of the permit

Compliance Assurance Monitoring (CAM) applies to the truck loading rack (EU-LR).

This unit is considered “other” Pollutant Specific Emission Units under CAM.

- Title V Condition 24 discusses the CAM details to be used by the facility rather than the installation of CEMS. These requirements are from a letter submitted by the facility dated August 8, 2001 and accepted by DEQ. The letter is provided as an attachment to this Statement of Basis.
- Title V Conditions 25 through 31 detail the requirements of the CAM program in order to remain in force, which include daily monitoring of the VRU operating parameters (vacuum level, carbon bed temperature and gasoline pressure) and VCU operating parameter (presence of flame) to ensure proper operation of the air pollution control devices.
- Title V Condition 32 stipulates that the monitoring device(s) be certified for accuracy annually at a minimum.
- Title V Condition 33 requires that each calendar month the vapor collection system, the vapor processing system, and the loading rack handling gasoline be inspected during the loading of gasoline to insure that no leaks or spills are present. Should a leak be detected the facility is required to repair the leak within 15 calendar days and the details of the leak and repair recorded.

Recordkeeping

- Title V Condition 34 describes the type of data that must be maintained by the facility and how the format of that data is determined.
- Title V Condition 35 requires that the records of the monthly leak checks be maintained on site as required in Condition 30 of the Title V permit.
- Title V Condition 36 requires that records of any stack testing be maintained for inspection for a minimum of five years.
- Title V Condition 37 details the data and information items necessary for the CAM operations as described at 40 CFR 64(9)(b).

Testing

- Title V Conditions 38 through 41 are related to the testing stipulations for the facility. These conditions require construction of emission units to be made such

that appropriate emissions testing can be conducted and if testing is conducted, in addition to that specified in the permit, the appropriate methods shall be approved by DEQ. The facility must also conduct stack testing for VOC emissions once each Title V permit term and includes the requirements on that requirement. These conditions are inclusive of Condition 9 of the April 23, 2003 NSR permit.

Reporting

- Title V Condition 42 stipulates the reporting requirements related to CAM.

TANKER TRUCK CERTIFICATION (VAPOR TIGHTNESS)

The following Codes of Federal Regulations have been determined to be applicable:

40 CFR 60, Subpart XX, Standards of Performance for Bulk Gasoline Terminals

Limitations

- Title V Condition 43 states that only tanker trucks with current vapor-tightness documentation shall be allowed to load gasoline and that it is the responsibility of the owner or operator to verify. The condition sets out the steps necessary to carry out these requirements.

Recordkeeping

- Title V Condition 44 and 45 requires the facility to maintain records of the tanker truck vapor-tightness documentation which must be updated annually and details the information which must be in the documentation. This facility uses the vapor tightness requirements of 40 CFR 63, Subpart R rather than 40 CFR 60, Subpart XX since the Subpart R requirements are more stringent, which is allowed. There must also be a record of any replacements or additions to the vapor control system.

Reporting

- Title V Condition 46 requires that any tanker truck loaded which did not meet the vapor tightness criteria of Condition 43 of the Title V permit shall be reported in the semiannual report.

FACILITY WIDE CONDITIONS

The following Virginia Administrative Codes have specific emission requirements that have been **Limitations**

- Title V Condition 47 requires emission calculations from the pumps, valves, flanges, open-ended piping, and the oil/water separator as derived from Condition 14 of the April 23, 2003 NSR permit.
- Title V Condition 48 allows the facility to operate in such a manner that the parameters used in the screening equation in 40 CFR 63.420(a)(1) are not exceeded for any 30-day rolling average, as documented by the results in the value of ET being less than 1.0. By maintaining these conditions the facility is exempt from the requirements of 40 CFR 63, Subpart R, except that records must be maintained as specified in 40 CFR 63.428(i).
- Title V Condition 49 requires the owner, operator, or other persons to taking reasonable precautions to prevent particulate matter from becoming airborne during any construction, modification, or operational phase at the facility.
- Title V Condition 50 describes the steps required to minimize emissions during the malfunction of the process equipment or air pollution control equipment as detailed in Condition 18 of the April 23, 2003 NSR permit.
- Title V Condition 51 requires the facility to submit emission data annually upon request from DEQ as specified in Condition 20 of the April 23, 2003 NSR permit.
- Title V Condition 52 sets out conditions which could cause the Title V permit to be modified or revoked in whole or in part as detailed in Condition 16 of the April 23, 2003 NSR permit

Monitoring

- Title V Condition 53 requires that annual emissions be calculated using the most current correlations and equations from AP-42 or the current version of the EPA Tanks program.
- Title V Condition 54 requires the owner or operator to conduct a monthly inspection of the facility to include valves, pumps, open-ended valves or lines, pressure relief devices, sampling connection systems, flanges, or other connectors in the gasoline liquid transfer or vapor systems. Acceptable methods are sight, sound, or smell.

Recordkeeping

- Title V Condition 55 requires that a copy of the Title V permit be kept on site.

- Title V Condition 56 requires the facility to maintain records necessary to demonstrate compliance as detailed in Conditions 4, 5, 6, 7, 8, and 12 of the April 23, 2003 NSR permit. The records are required to be kept for a period of not less than 5 years.
- Title V Condition 57 requires that the records of the data used to verify that the facility has not exceeded the screening equation at 40 CFR 63.402 must be maintained. These records shall be kept for a minimum of 5 years.

Testing

- Title V Condition 58 requires that the facility be constructed to allow for emission testing, using appropriate methods as specified in Condition 9 of the April 23, 2003 NSR permit.
- Title V Condition 59 states that if additional testing is conducted in addition to that required in the Title V permit that DEQ approved methods shall be used.

STREAMLINED REQUIREMENTS

The following conditions in the April 23, 2003 NSR permit have not been included in the Title V permit for the following reasons:

Condition 13 states the toxic pollutants that are exempt from regulations, but were included in the Title V application. There is no need to include pollutants that are not applicable.

Condition 14 a portion of this condition was related to a groundwater remediation project which has since been completed and that reference in this condition has not been included in this Title V permit.

Condition 17 is a condition that is in the Title V General Condition of the Title V permit at Condition 85 and is therefore not repeated in the Title V permit.

Condition 19 is a condition that is in the Title V General Conditions of the Title V permit at Condition 89 and is therefore not repeated in the Title V permit.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

- Permit Expiration – Title V Conditions 63 through 68

These conditions refer to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.2-604 and §10.1-1185 of the Code of Virginia, and the “Department of Environmental Quality Agency Policy Statement No. 2-09”.

- Failure/Malfunction Reporting – Title V Conditions 74

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

- Permit Modification – Title V Condition 78

This general condition cites the sections that follow:

9 VAC 5-80-50. Applicability, Federal Operating Permit for Stationary Sources
9 VAC 5-80-190. Changes to Permits.
9 VAC 5-80-260. Enforcement.
9 VAC 5-80-1100. Applicability, Permits for New and Modified Stationary Sources
9 VAC 5-80-1605. Applicability, Permits for Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas
9 VAC 5-80-2000. Applicability, Permits for Major Stationary Sources and Major Modifications Locating in Nonattainment Areas]

- Malfunction as an Affirmative Defense – Title V Conditions 92 through 95

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition U and General Condition F. For further explanation see the comments on general condition F.

This general condition cites the sections that follow:

9 VAC 5-20-180. Facility and Control Equipment Maintenance or Malfunction
9 VAC 5-80-110. Permit Content

- Asbestos Requirements - Title V Condition 99

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission

Standards for Asbestos.

This general condition contains a citation from the Code of Federal Regulations that follows:

40 CFR 61.145, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to demolition and renovation.

40 CFR 61.148, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to insulating materials.

40 CFR 61.150, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to waste disposal.]

STATE ONLY APPLICABLE REQUIREMENTS

There are no “State Only” applicable requirements identified for this source.

INAPPLICABLE REQUIREMENTS

9 VAC 5 Chapter 40, Article 25 – (Emission Standards for Volatile Organic Compound Storage and Transfer Operations). This facilities is subject to 9 VAC 5 Chapter 40, Article 37 (Petroleum Liquid Storage and Transfer Operations) and therefore is not subject to 9 VAC 5 Chapter 40, Article 25 by 9 VAC 5-40-3410(C)(1).

40 CFR 63, Subpart R – (National Emission Standard for Gasoline Distribution Facilities Bulk Gasoline Terminals and Pipeline Breakout Stations). The facility has demonstrated that the screening factor E_T is less than 1 and therefore not subject to 40 CFR 63, Subpart R. The facility continues to maintain records to verify that E_T does not exceed 1 retaining the exemption from 40 CFR 63, Subpart R. Additionally the facility is not a major source of hazardous air pollutants (HAP).

40 CFR 68 – (Chemical Accident Prevention Provisions). Petroleum liquids (gasoline, diesel fuel, jet fuel, etc.) are not subject to this rule.

After July 1, 2011, sources that emit over 100,000 tpy CO₂e and have a CO₂e mass equivalent to 100 tpy are required to have a Title V permit even if they are not Title V major for any criteria pollutant or HAP. Additionally, any source that increases their CO₂e emissions more than 75,000 tpy as a result of a modification is required to address their CO₂e emissions as part of the Title V permit.

Buckeye Terminals, LLC is not currently subject to GHG regulations. There are no applicable GHG permitting requirements for this source.

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation ¹	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
EU-7	Additive tank	9 VAC 5-80-720 B	VOC	—
EU-8	Additive tank	9 VAC 5-80-720 B	VOC	—
EU-9	Additive tank	9 VAC 5-80-720 B	VOC	—
EU-10	Additive tank	9 VAC 5-80-720 B	VOC	—
EU-11	Additive tank	9 VAC 5-80-720 B	VOC	—
EU-12	Additive tank	9 VAC 5-80-720 B	VOC	—
EU-13	Additive tank	9 VAC 5-80-720 B	VOC	—
EU-T1	Storage tote	9 VAC 5-80-720 B	VOC	—
EU-T2	Storage tote	9 VAC 5-80-720 B	VOC	—
EU-OWS	Oil/water Separator	9 VAC 5-80-720 B	VOC	—

¹The citation criteria for insignificant activities are as follows:
 9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application
 9 VAC 5-80-720 B - Insignificant due to emission levels
 9 VAC 5-80-720 C - Insignificant due to size or production rate

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

The proposed permit will be placed on public notice in the Washington Times from January 23, 2015 to February 25, 2015, with no comments received.

The proposed permit was submitted to EPA on January 22, 2015 for concurrent review with the public review period and the additional 15 days offered to EPA, which ended on March 9, 2015. There were no comments from EPA.

ATTACHMENTS

Monitoring/Auditing Program (CAM Plan)

bp

Atlantic Business Unit/Mid-Atlantic Region

RECEIVED

AUG 13 2001

Northern Va. Region
Dept. of Env. Quality



BP Amoco Company
Suite 400
1 West Pennsylvania Avenue
Towson, Maryland 21204-5027

August 8, 2001

Mr. David Hartshorn
State of Virginia
Department of Environmental Quality
Northern Virginia Regional Office
13901 Crown Court
Woodbridge, VA 22193

RE: Monitoring/Audit Program
Amoco Oil Company
Fairfax Terminal
Title V Air Permit # NVRO-70220

Direct 410 847 1800
Fax 410 847 1815

Dear Mr. Hartshorn:

In accordance with Section IV Part B of the above referenced Title V air permit, bp is proposing the following monitoring and audit program for the Vapor Combustion Unit (VCU) and Vapor Recovery Unit (VRU) located at the Fairfax, Virginia terminal. The VRU and VCU are currently in good working order, as illustrated by the June 2001 stack test performed by Jordan Services. The results of those stack tests were communicated to you via correspondence from Mark Cleveland on July 3, 2001.

With regard to the VRU, bp proposes to monitor the following parameters on a daily basis. The proposed action ranges are in accordance with the recommended operating parameters published by the unit manufacturer (John Zinc Company). Should the measured values be not comply with the proposed ranges, the VRU will be shut down and the cause of such a deviation will be investigated and corrected in a timely manner.

Monitored Item	Normal Range
Vacuum level within carbon bed while in service	0 to 28" Hg
Temperature as measured at the middle of the carbon bed while in service	20 to 200 °F
Gasoline pressure as measured at the top of the absorber	10 to 18 psi

Hg – Mercury
psi – pounds per square inch

In addition to the above monitoring/audit plan for the VRU, an additional stack test will be performed on the unit in 2004. The additional stack test will ensure compliance with the Title V permit.

Mr. David Hartshorn

August 8, 2001

With regard to the VCU, bp proposes to monitor the following parameters on a daily basis. The proposed action ranges are in accordance with the recommended operating parameters published by the unit manufacturer (John Zinc Company). Should the measured values be not comply with the proposed ranges, the VCU will be shut down and the cause of such a deviation will be investigated and corrected in a timely manner.

Monitored Item	Normal Range
Presence of flame	Yes

Please feel free to contact bp with any questions you may have regarding this proposed plan. I can be reached at 703-503-3685.

Sincerely,



Mark Cleveland
Distribution Center Manager

cc: Robert Miller - bp
Maribeth Dobbins - bp

Tank EU-3 Exemption Letter



NVRO-012-06

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY
NORTHERN VIRGINIA REGIONAL OFFICE
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Preston Bryant
Secretary of Natural
Resources

David K. Paylor
Director

Jeffery A. Steers
Regional Director

January 31, 2006

Ms. Meribeth E. Dobbins
Health, Safety, Security, and Environmental Advisor
BP Products North America, Inc.
1 West Pennsylvania Avenue, Suite 440
Towson, Maryland 21204

Re: Tank # 3 modification to an internal floating roof tank and storage of refined petroleum products.

Location: Fairfax County, Fairfax City
Registration No.: 70220
AFS ID No. 51-600-00061

Dear Ms. Dobbins:

The Department of Environmental Quality (DEQ), Northern Virginia Regional Office staff has completed its review of your request to modify and operate a bulk petroleum storage facility at Fairfax City, Virginia.

Based on this review, it has been determined that the proposed project is exempt from the permitting requirements of Chapter 80, Article 6 of the Virginia Regulations for the Control and Abatement of Air Pollution as long as it is constructed and operated as described in your exemption request letter. This is because the proposed project is not subject to Major Source New Source Review under Articles 9, and:

- The conversion of Tank # 3 does not meet the Article 6 definition of "modification" since the change to the tank is to add control equipment (Internal floating roof), which is not considered a modification.
- The net emissions increase of volatile organic compounds (VOC) from the source for which modification is proposed is 1.93 tons per year which is less than the 10 ton per year exempt emission rate in 9 VAC 5-80-1320 D.

Event	Date	Initials
Code <i>EPL</i>	<i>1/31/06</i>	<i>HGB</i>
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Ms. Meribeth E. Dobbins
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Additionally, there are no HAPs or toxic pollutant emissions from the source which would be subject to permitting under Article 6 because:

- The facility is not subject to any applicable MACT or NESHAPS standard and the facility's potential to emit benzene is 0.02 pounds per hour which is less than the toxic exempt emission rates of 9 VAC 5-60-300 C.1 and 2 (9 VAC 5-80-1320 E.1).

Finally, the facility is not an affected facility under 40CFR60, subpart Kb, because the tank, as constructed in 1964, was capable of storing gasoline this is not considered a modification and there not subject to NSPS.
(40CFR60.14.e(4))

This decision concerning permit applicability is not binding upon the Department and is subject to change upon further review.

Although this Tank # 3 conversion is not subject to permitting requirements, it is still subject to the registration requirements of 9 VAC 5-20-160 of the Regulations and subject to periodic inspections by the Department. The information that you have submitted will be kept on file as update information concerning this facility. The information provided will be incorporated into the facilities Title V permit renewal. **Please refer to the Registration No, 70220 on all future correspondence dealing with your facility.**

You are cautioned that this decision also should not be construed to mean that your operation is automatically in compliance with all aspects of the Regulations for the Control and Abatement of Air Pollution. Regional personnel will be constantly evaluating all sources for compliance with the Regulations.

Any owner claiming that a facility is exempt from the provisions of 9 VAC 5, Chapter 80, Article 6 shall keep records in accordance with 9 VAC 5-80-1320 A.4 as may be necessary to demonstrate to the satisfaction of the Department its continued exempt status.

If you have questions concerning this matter please contact Howard G. (Gary) Beeson at (703) 583-3969. Your concern for Virginia's Air Quality is appreciated.

Sincerely,



Terry H. Darton
Regional Air Permit Manager

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